MEMORANDUM ENDORSED

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/12/2021

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August 10, 2021

Hon. Gregory H. Woods United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 via ECF

> Re: United States v. Adamson, et al 19 Cr 702 (GHW)

Your Honor:

I write on behalf of the defendants, Hasahn Murray, by David Bertan, Esq., and our client Jamal Adamson, to request that the Court adjourn the August 13, 2021, motion schedule to a date after Labor Day. The defense recently received a large volume of new, significant discovery material that our clients must review. Although matters in MDC have eased somewhat, it is still difficult for the defendants to review discovery as they have insufficient access to the needed computers. Our ability to meet with our clients has improved but it is difficult to secure a private room with a computer for discovery review and confidential discussions. The limited number of attorney rooms at the MDC are in demand and must be reserved at least a week in advance.

As the Court is aware, the defendants are facing mandatory life sentences if convicted which make is particularly critical that they have the opportunity to review the new evidence and consider a resolution of the case short of trial. Both defendants are actively engaged in plea negotiations and require the requested time to complete negotiations which must be resolved before motions are filed. Some counsel have planned vacation time after the motions are currently due, which contributes to our request for additional time if motions are needed. The government, by Maureen Comey, Esq., consents to this application. Therefore, we request that the Court adjourn the motion schedule to a date after September 6, 2021.

Respectfully,

Lisa Scolari

Lisa Scolari and Thomas Ambrosio Attorneys for Jamal Adamson

Application granted. The deadline for the parties' pretrial submissions required under the Court's December 23, 2019 order, Dkt. No. 12, is extended to September 7, 2021. The parties should not expect further extensions of time. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 60.

SO ORDERED.

Dated: August 12, 2021 New York, New York

GREGORY H. WOODS United States District Judge